

Tayjalaya S. Williams
2240 S Elks Lane, Unit 13
Yuma, Arizona 85364
928-408-1422
Tayjalayastormwilliams@gmail.com

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DISTRICT OF ARIZONA	
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May 2nd, 2024

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Transamerica Life Insurance Company,
Plaintiff,
v.
Tayjalaya S. Williams,
Defendant.

Case No.: 2:24-cv-00379-ROS

DEFENDANT'S MOTION TO CLARIFY AND ADDRESS PLAINTIFF'S MOTION TO STRIKE DOCUMENT
31

MEMORANDUM OF LAW IN SUPPORT OF MOTION

TO THE HONORABLE Roslyn O. Silver, AND TO THE PLAINTIFF HEREIN

I. INTRODUCTION

I, Tayjalaya S. Williams, the pro se defendant in this case, respectfully present this Motion to Clarify and Address Plaintiff's Motion to Strike Document 31 in adherence to the Local Rules of Civil Procedure for the United States District Court for the District of Arizona.

BACKGROUND

Document 31, highlighted in the plaintiff's motion, was meticulously created to supplement my explicit consent to magistrate jurisdiction expressed through communications with Transamerica's Attorney via Email titled "I Tayjalaya Williams, REQUESTS TO CHANGE 8,11,13,14,15,16," (*see Ex. A*) and Further clarification of change and personal stance in joint conference call. Its purpose was not as a formal court submission but as a tool for accurately reflecting my stance during the joint management report process.

II. DISCUSSION

1. Purpose of Document 31: Originally labeled "REPORT of Rule 26(f) Planning Meeting by Tayjalaya S Williams," Document 31 aimed to confirm my willingness to consent to magistrate jurisdiction, despite the plaintiff's assertion that all parties had not consented. Thus, I formally request a title change to "Pro Se Motion to Confirm Tayjalaya S. Williams's Consent to Magistrate Jurisdiction" to better encapsulate its essence and significance in validating my consent to the magistrate court.
2. Misinterpretation by Plaintiff: The misunderstanding surrounding Document 31 mandates clarification. It was devised not as a standalone submission but as a reference point for our shared case management efforts.

III. REQUEST FOR RELIEF

I respectfully urge the Court to approve the title change for Document 31 to "Pro Se Motion to Confirm Tayjalaya S. Williams's Consent to Magistrate Jurisdiction." This modification aligns the document's title with its actual purpose in affirming my consent to magistrate jurisdiction.

Additionally, I ask for a reconsideration of Transamerica's attorney fees imposition in light of the misrepresentations and the supportive nature of Document 31 to ensure fair proceedings.

V. CERTIFICATE OF SERVICE

I attest that a correct copy of this motion was duly served to the plaintiff via U.S. Mail on May 2nd, 2024.

IV. CONCLUSION

In summary, the significance of Document 31 in accurately portraying my stance on magistrate jurisdiction holds vital importance. Despite the plaintiff's claim of lack of consent from all parties in the finalized joint management report (doc No. 25), titled "REPORT of Rule 26(f) Planning Meeting by Transamerica Life Insurance Company," Document 31 was intended to confirm my individual consent. Thus, Document 31 should now be appropriately retitled as "Pro Se Motion to Confirm Tayjalaya S. Williams's Consent to Magistrate Jurisdiction." This adjustment ensures precision and integrity in the judicial process.

Respectfully and with a dedication to fair proceedings,

DATED this 2nd day of May 2024.

By: /s/
Tayjalaya S. Williams

Pro Se

Defendant

Exhibit A



On Fri, Apr 12, 2024, 1:19 PM Jacobsohn, Andrew <AJacobsohn@lewisroca.com> wrote:

Hello,

As you are aware, the Court has ordered that the parties appear for a scheduling conference on April 30, 2024 (the order is attached for your convenience). Ahead of that conference, the parties must meet and confer according to R. 26(f) by no later than **Friday, April 19, 2024**, and submit to the Court a Joint Case Management Report and proposed Scheduling Order by **Tuesday, April 23, 2024**. Please review the attached drafts of these documents and let me know if you request any changes, especially to the due dates listed therein. Areas of note are highlighted.

Please let my assistant, Sonya Rodgriguez (cc'd) and I know when you are available for a call next week. Sonya will circulate conference call information once we have received everyone's availability.

Please REPLY ALL when responding to this email.

Best,

Andrew

Andrew Jacobsohn

Associate



I Tayjalaya Williams, REQUESTS TO CHANGE 8,11,13,14,15,16, ➤ ★

Inbox



Goddess laya Apr 13

to Jacobsohn, Skipp... ▾



From Goddess laya • tayjalayastormwilliams@gmail.com

To Jacobsohn, Andrew • AJacobsohn@lewisroca.com

Cc Skippy Jones • skippyjones90@icloud.com
Anthony Montoya • anthony@montoyalawoffice.com
Bressler, Stephen • SBressler@lewisroca.com
Rodriguez, Sonya • SRodriguez@lewisroca.com
Hirka, George • GHirka@lewisroca.com

Date Apr 13, 2024, 5:42 AM

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Number 8: consenting to a magistrate judge

Defendant Tayjalaya Williams, appearing pro se, expresses her willingness to consent to the jurisdiction of a magistrate judge for certain aspects of the case, including pretrial matters and procedural issues.





201 East Washington Street, Suite 1200

Phoenix, Arizona 85004-2595

lewisroca.com

LEWIS ROCA ROTHGERBER CHRISTIE LLP

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❖ Tayjalaya Williams joint
management report❖.docx, 38 KB

